

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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**SECURITIES AND EXCHANGE COMMISSION,**

**Plaintiff,**

**v.**

**DEVON D. ARCHER, BEVAN T. COONEY,  
HUGH DUNKERLEY, JASON W. GALANIS,  
JOHN P. GALANIS, GARY T. HIRST and  
MICHELLE A. MORTON,**

**Defendants.**  
----- X

**16 Civ. 3505 (WHP)**

**ECF Case**

**NOTICE OF MOTION FOR LEAVE TO FILE  
AMENDED COMPLAINT  
PURSUANT TO FED. R. CIV. P. 15(a) AND 21**

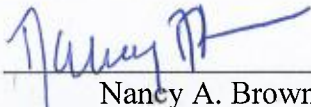
PLEASE TAKE NOTICE, that upon the Declaration of Nancy A. Brown, executed November 7, 2016, and the Exhibits thereto, and the Memorandum of Law in Support of the Motion, and the prior proceedings had herein, Plaintiff Securities and Exchange Commission ("Commission"), will move this Court, at a date and time to be determined by the Court, before the Honorable William H. Pauley, III, at the United States Courthouse for the Southern District of New York, 500 Pearl Street, New York, New York 10007, for an Order pursuant to Fed. R. Civ. P. 15(a) and 21 granting the Commission leave to file an amended complaint in this action;

and such other and further relief as the Court may deem just and proper.

Dated: New York, New York  
November 4 2016

Respectfully submitted,

SECURITIES AND EXCHANGE COMMISSION

By:   
Nancy A. Brown  
New York Regional Office  
Securities and Exchange Commission  
Brookfield Place, 200 Vesey Street, Suite 400  
New York, New York 10281  
(212) 336-1023  
Attorneys for Plaintiff